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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LAWRENCE LIU, an individual; and
LING-LING LIU, an individual;

Plaintiffs,

v.

THE CHARLES SCHWAB CORPORATION, a
Delaware corporation;
CHARLES SCHWAB BANK, SSB, a Texas-
chartered savings bank;
BANK OF AMERICA, N.A., a national banking
association; and
UNCHAINED TRADING, LLC, a Texas limited
liability company,

Defendants.

Case No. 4:24-cv-07400-HSG

**JOINT STIPULATION AND ORDER
REGARDING BRIEFING SCHEDULE FOR
DEFENDANT BANK OF AMERICA, N.A.'S
MOTION TO DISMISS OR,
ALTERNATIVELY, MOTION TO STAY
PENDING COMPLETION OF
ALTERNATIVE DISPUTE RESOLUTION
(as modified)**

Pursuant to Civil L.R. 6-1 and 7-12, Plaintiffs Lawrence and Ling-Ling Liu and Defendant Bank of America, N.A. (together with Plaintiffs, the “Parties”) submit this stipulation regarding the time to respond to Defendant’s Motion to Dismiss, or, Alternatively, to Stay Pending Completion of Alternative Dispute Resolution (the “Motion”) (Dkt. 32).

WHEREAS, on October 23, 2024, Plaintiffs filed this lawsuit, Dkt. No. 1;

WHEREAS, on January 10, 2025, Defendant filed the Motion, Dkt. No. 32;

WHEREAS, under Civil L.R. 7-3(a) and 7-3(c), Plaintiffs’ deadline to oppose the Motion is currently January 24, 2025, and Defendant’s deadline to reply to any such opposition is seven days after such opposition is filed;

WHEREAS, counsel for the Parties have conferred and agreed regarding a reasonable extension in order for the Parties to have adequate time to prepare further briefing regarding the Motion;

WHEREAS, the Parties have agreed, and jointly request, to extend the deadline for Plaintiffs’ opposition to the Motion to February 10, 2025, and to extend the deadline for Defendant’s reply in support of the Motion to February 24, 2025;

WHEREAS, the stipulated extension of time would not have any effect on any other date or deadline set by the Court;

NOW THEREFORE, THE PARTIES HEREBY STIPULATE as follows:

1. The deadline for Plaintiffs to file their opposition to Defendant’s Motion to Dismiss, or, Alternatively, to Stay shall be extended to February 10, 2025;

2. The deadline for Defendant to file its reply in support of its Motion to Dismiss, or, Alternatively, to Stay shall be extended to February 24, 2025.

3. The hearing on the Defendant’s Motion to Dismiss, or, Alternatively, to Stay shall be set for April 10, 2025, at 2pm.

IT IS SO STIPULATED.

Date: January 14, 2025

/s/ Noah A. Levine

Michael Mugmon

Noah A. Levine (*admitted pro hac vice*)

Marissa M. Wenzel (*admitted pro hac vice*)

Michael McGuinness (*pro hac application forthcoming*)

Date: January 14, 2025

/s/ David C. Silver

Karl S. Kronenberger

David C. Silver (*admitted pro hac vice*)

Eric F. Rosenberg (*admitted pro hac vice*)

CERTIFICATION

I, Noah A. Levine, am the ECF User whose identification and password are being used to file this STIPULATION AND [PROPOSED] ORDER REGARDING MOTION TO DISMISS, OR, ALTERNATIVELY, MOTION TO STAY BRIEFING SCHEDULE. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that each other signatory has concurred in this filing.

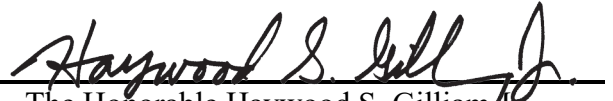
Date: January 14, 2025

/s/ Noah A. Levine
Noah A. Levine

ORDER

Pursuant to the foregoing stipulation, IT IS SO ORDERED: Plaintiffs' deadline to file an opposition to Defendant's Motion to Dismiss, or, Alternatively, to Stay [Dkt. No. 32] is February 10, 2025. Defendant's deadline to file a reply in support of Motion to Dismiss, or, Alternatively, to Stay is February 24, 2025. The hearing on Defendant's Motion to Dismiss, or, Alternatively, to Stay is April 10, 2025. The initial case management conference, previously set for January 21, 2025 is continued in-person to April 10, 2025, before Judge Haywood S. Gilliam, Jr., at 2:00 p.m., to be held along with the hearing on the motion to dismiss, or, alternatively, to stay.

Dated: 1/15/2025


The Honorable Haywood S. Gilliam Jr.
United States District Judge